

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KAWALJEET K. TAGORE,)
)
Plaintiff,)
)
v.)
)
THE UNITED STATES OF AMERICA,)
U.S. DEPARTMENT OF HOMELAND)
SECURITY, FEDERAL PROTECTIVE)
SERVICE; U.S. DEPARTMENT OF THE)
TREASURY; JANET NAPOLITANO,)
Secretary of the U.S. Department of)
Homeland Security; TIMOTHY F.)
GEITHNER, Secretary of the Treasury;)
WILLIAM A. CARMODY, III; DAVID)
HIEBERT; CHRISTINA NAVARETE-)
WASSON; SERGIO ARELLANO; JAMES)
K. ELLIS; NIEVES NARVAEZ; and)
DOES 1-25,)
)
Defendants.)
_____)

Case No. 4:09-CV-00027

**FEDERAL DEFENDANTS' UNOPPOSED MOTION FOR
EXPEDITED RESPONSE TO AND CONSIDERATION OF
FEDERAL DEFENDANTS' MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT
AND TO POSTPONE MAY 1, 2009 SCHEDULING CONFERENCE**

The defendants and named individuals insofar as they are sued in their official capacities ("Federal Defendants"), by and through undersigned counsel, respectfully move this Court for expedited response to and consideration of Federal Defendants' Motion, filed today, for a forty-five day enlargement of time, up to and including June 5, 2009, to answer or otherwise respond to Plaintiff's Complaint, and to postpone the initial pretrial conference currently scheduled for May 1, 2009 (Docket #9). In compliance with LR 7.1, April 6, 2009, undersigned counsel discussed the relief requested with Scott Newar, attorney-in-charge for Plaintiff, who represented

that Plaintiff does not oppose expediting her response to Federal Defendants' motion to April 15, 2009.

In support of this Motion, Federal Defendants state as follows:

1. Federal Defendants are also today filing a Motion for Extension of Time To Answer or Otherwise Respond to Plaintiff's Complaint and to Postpone May 1, 2009 Scheduling Conference. Federal Defendants' answer or other response to Plaintiff's Complaint is currently due by April 21, 2009. Pursuant to LR7.4 of this Court, Plaintiff would ordinarily have twenty days, or until April 27, 2009, to respond to Federal Defendants' Motion for Extension of Time to respond. This would be after Federal Defendants' response to Plaintiff's Complaint is currently due.

2. In order to allow for decision on Federal Defendants' Motion for Extension of Time prior to the current due date of Federal Defendants' response to Plaintiff's Complaint, Federal Defendants request expedited response to and consideration of their Motion. Federal Defendants do not believe that Plaintiff will be prejudiced by this expedited consideration, and indeed, Plaintiff does not oppose the relief requested.

DATED: April 6, 2009

Respectfully submitted,

MICHAEL F. HERTZ
Acting Assistant Attorney General

TIM JOHNSON
Acting United States Attorney

STUART A. LICHT
Assistant Branch Director

/s/ Vesper Mei
VESPER MEI (DC Bar 455778)
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Attorneys for Federal Defendants

CERTIFICATE OF CONFERENCE

I hereby certify that in compliance with LR 7.1, on April 6, 2009, I contacted Scott Newar, attorney-in-charge for Plaintiff, who represented that Plaintiff does not oppose expediting her response to April 15, 2009 to Federal Defendant's Motion for Extension of Time To Answer or Otherwise Respond to Plaintiff's Complaint and to Postpone May 1, 2009 Scheduling Conference.

/s/ Vesper Mei
VESPER MEI

CERTIFICATE OF SERVICE

I, Vesper Mei, an attorney, hereby certify that on April 6, 2009, I electronically transmitted the foregoing Federal Defendants' Unopposed Motion for Expedited Response to and Consideration of Motion for Extension of Time To Answer or Otherwise Respond to Plaintiff's Complaint and to Postpone May 1, 2009 Scheduling Conference to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic filing and to the following ECF registrants:

Scott David Newar
Attorney at Law
700 Louisiana
25th Fl
Houston , TX 77002
Email: newar@newarlaw.com

Eric Christopher Rassbach
The Becket Fund for Religious Liberty
1350 Connecticut Ave NW
Ste 605
Washington , DC 20036
Email: erassbach@becketfund.org

I further certify that a copy of the foregoing Motion was mailed this 6th day of April,
2009, to the following:

Amardeep Singh Bhalla
The Sikh Coalition
40 Exchange Place
Ste. 728
New York , NY 10005

Harsimran Kaur Dang
The Sikh Coalition
39465 Paseo Padre Pkwy
Ste. 3550
Freemont , CA 94538

/s/ Vesper Mei
VESPER MEI